

Dear Mr. Nelson and Members of the Recycling Committee:

Below are The Arc Eastern Connecticut's responses to the questions posed in the Scoping Document of November 9, 2021.

**1. What types of information should DEEP request from applicants?**

Prior experience

Relationships within the community

Support of local leaders and other businesses

Commitment to providing employment training

Commitment to recycling as an environmental issue and not just a business venture

Relationship with resource recovery centers who will take the recyclables

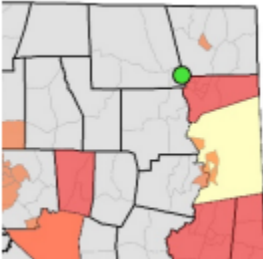
**2. What factors should DEEP evaluate when reviewing applications?**

It is imperative that the DEEP take into consideration the number of recycling centers in an area, as well as the Agency's own criteria, i.e., "Prior experience." It is critical that DEEP **include existing facilities in rural locations when accepting applications, particularly nonprofit entities**. The current funding limitation to new facilities is exceedingly harsh with regard to Eastern CT, a rural region with trash from many visitors and a good deal of "pass-through" traffic via interstate corridors. Further, the region already is woefully underrepresented in the redemption market as well as many other state-sponsored initiatives, due to its rural nature. By including existing facilities, facilities in rural regions, and/or nonprofit enterprises, DEEP can rectify this inequity. Only a lack of investment prevents The Arc Eastern CT—a grassroots non-profit advocacy organization – from providing ever more extensive vocational training and employment opportunities via meaningful jobs at minimum wage or higher for people with intellectual and developmental disabilities. This green initiative likewise benefits every resident of Eastern Connecticut as well as the State's vital tourism industry.

**3. What siting criteria within urban centers and environmental justice communities should DEEP prioritize for optimal redemption center location – for example, should eligibility for funding through this program be limited to new redemption centers that are located more than a one-mile radius from existing redemption center? Should that radius be greater in municipalities with lower population densities?**

Again, eligibility for funding should not be limited to new redemption centers only or to urban centers. While both are understandably important areas of investment, doing so to the exclusion of **existing redemption centers, especially nonprofit organizations and organizations in rural areas operating next to an urban center (i.e., Putnam) is particularly unjust**. Such towns already are at a disadvantage, and only become more so, whenever at-risk rural settings are excluded from important State-sponsored

**initiatives such as this one.** Looking at the Scoping Document’s own map, indicating The Arc ECT’s recycling center location in northeastern Connecticut, The Arc ECT’s redemption center clearly requires supports like this valuable grant program in order for the agency to remain viable and to provide job opportunities for people with IDD in a region still struggling to recover from the Recession and a world-wide pandemic.



**4. Should DEEP require performance reporting from grantees? What metrics should be included in such reporting?**

The Arc ECT gladly will provide ALL performance reporting that DEEP requires; as a nonprofit well-versed in accurate and timely reporting requirements, as well as outcomes-based results, The Arc ECT’s redemption center is well equipped to provide DEEP any necessary data sets and meet all reporting requirements.

**5. Should DEEP include certain minimum processing capacity or technology/equipment requirements for eligible grantees? What should be the minimum processing capacity be for a grantee?**

A minimum capacity requirement would not support or enhance collection activities in rural areas; nor would it support other nonprofit entities’ engagement in redemption work in support of DEEP’s redemption initiatives and interests. The important goal of this initiative is that recycling takes place, and that it has both a positive economic and environmental and social impact.

**6. Should DEEP consider providing additional grant funding after the first year of operation based on performance metrics—for example, a standard “cents-per-container” calculation based on the number of containers redeemed by the grantee in the prior year of operation?**

The Arc ECT – and eastern Connecticut in its entirety – would greatly benefit environmentally and economically should grant funding be made available to existing collection centers and/or nonprofit redemption operations – particularly those in rural areas.

**7. What other grant program priorities should DEEP consider? What other questions should DEEP address in the final grant program application process.**

Again, **DEEP should include existing redemption centers and nonprofit redemption operations and the interests of rural areas as part of this application process.** The last public comment period demonstrated that too many centers had closed due to lack of funding, and DEEP has determined that there are not enough centers in the state. With this factual evidence in mind, it is imperative that DEEP allow redemption centers like The Arc ECT's to take advantage of funds that could keep the center operational in an area that has very few redemption alternatives. Other than this request, we appreciate the grant opportunities that DEEP offers non-profits like The Arc ECT within the state of Connecticut.